

THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
No. 5:21-CT-3270-D

Tracey Edwards,

Plaintiff

v.

Eddie Buffaloe Jr., Benita Witherspoon,
Anthony Perry, James Alexander, Gary
Junker, Elton Amos, Kavona Gill, Tamara
Brown, Nikita Dixon, Tammy Williams,
Shelda Brodie, Tianna Lynch, and Lorafaith
Ragano,

Defendant(s)

**PLAINTIFF'S MOTION FOR
SANCTIONS**
Fed. R. Civ. P. 37

PLAINTIFF'S MOTION FOR SANCTIONS

Pursuant to Rule 37 of the Federal Rules of Civil Procedure, Plaintiff Tracey Edwards hereby moves for sanctions against Defendants Eddie Buffaloe Jr., Benita Witherspoon, Anthony Perry, James Alexander, Gary Junker, Elton Amos, Kavona Gill, Tamara Brown, Nikita Dixon, Tammy Williams, Shelda Brodie, Tianna Lynch, and Lorafaith Ragano for failing to comply with the Court's November 28, 2022, Order and their discovery obligations under Federal Rules of Civil Procedure 30, 33, and 34. In support thereof, Plaintiff Tracey Edwards relies on the contemporaneously filed Memorandum in Support of Motion for Sanctions and attached Exhibits. The discovery requests and responses of Defendants Buffaloe, Witherspoon, Perry, Alexander, Junker, and Amos were attached to Plaintiff's Motion to Compel, Dkt. 67. Supplemental discovery responses of Defendants Buffaloe, Alexander, Junker, and Witherspoon were attached to Plaintiff's Opposition to Defendants' Motion for Extension of Time to Fully Supplement Discovery Responses. *See* Dkt. 94-2. The other discovery requests and responses at issue are

attached to the contemporaneously filed Declaration of Lauren Kuhlik.

WHEREFORE, Plaintiff Tracey Edwards respectfully asks this Court to sanction Defendants Eddie Buffaloe Jr., Benita Witherspoon, Anthony Perry, James Alexander, Gary Junker, Elton Amos, Kavona Gill, Tamara Brown, Nikita Dixon, Tammy Williams, Shelda Brodie, Tianna Lynch, and Lorafaith Ragano.

Dated: February 14, 2023

Respectfully submitted,

/s/ Lauren Kuhlik
Lauren Kuhlik (*By Special Appearance*)
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Local Rule 83.1 (d) Counsel for Plaintiff

April N. Ross (*By Special Appearance*)
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**Aryeh Mellman (*Notice of Special Appearance to be Filed; Admission to Federal Court Pending*)

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CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of February 2023 a copy of the foregoing was filed and served via the Court's CM/ECF system, which shall separately serve via electronic mail upon all counsel of record as follows:

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/s/ Lauren Kuhlik
Lauren Kuhlik